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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,)	2:14-cr-332-JAD-VCF
)	
)	
Plaintiff,)	
)	
vs.)	
)	
EDWARD JAMESON PURRY II,)	
)	
Defendant.)	
_____)	

UNOPPOSED MOTION TO CONTINUE SENTENCING HEARING

The United States of America, by and through DANIEL G. BOGDEN, United States Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney, hereby files a Motion to Continue the Sentencing Hearing in the above-entitled manner, currently set for October 28, 2015, at 10:00 a.m., to a date and time convenient for this Court, but in no event earlier than fourteen (14) days.

This motion is filed for the following reasons:

1. The Defendant filed a sentencing memorandum on September 28, 2015. *See* Docket #112.
2. Based on the issues raised in the Defendant's sentencing memorandum, the Government anticipates having to file a lengthy sentencing memorandum in response.

1 3. The Government needs more time to prepare its sentencing memorandum, taking
2 into account due diligence.

3 4. The Government has requested additional information that it needs in order to
4 establish the challenged sentencing enhancements, and is awaiting receipt of that information.

5 5. The Government also wants to ensure that the Court has sufficient time prior to
6 the sentencing hearing to review what the Government anticipates will be a lengthy sentencing
7 memorandum.

8 6. Additionally, the undersigned is preparing for trial in the matter of *United States*
9 *v. Michael Beale*, 2:15-cr-156-JAD-PAL, currently scheduled to commence on November 3,
10 2015.

11 7. Denial of this request for a continuance of the sentencing hearing could
12 potentially prejudice both parties.

13 8. Additionally, denial of this request for continuance could result in a miscarriage
14 of justice.

15 9. This is the fourth stipulation filed herein to continue the sentencing hearing.

16 DATED: October 23, 2015.

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18 _____
19 /s/
20 PHILLIP N. SMITH, JR.
21 Assistant United States Attorney
22 Counsel for the United States
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,)	2:14-cr-332-JAD-VCF
)	
)	ORDER CONTINUING
Plaintiff,)	SENTENCING HEARING
)	
vs.)	
)	
EDWARD JAMESON PURRY II,)	
)	
Defendant.)	

ORDER

Based on the pending motion filed by counsel for the United States, and good cause appearing therefore, **IT IS HEREBY ORDERED**, that the sentencing hearing in the above-captioned matter, currently scheduled for October 28, 2015, at the hour of 10:00 a.m., be vacated and continued to Monday, November 30, 2015 at 9:00 a.m.


UNITED STATES DISTRICT JUDGE

October 23, 2015